

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

vs.

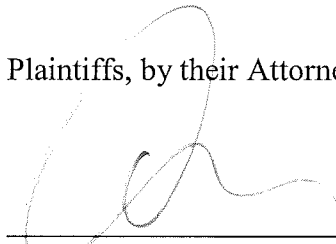
C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE A REPLY TO DEFENDANTS' NEW  
ARGUMENTS IN SUPPORT OF THEIR RULE 12(b)(1) MOTION**

For the reasons presented in the accompanying Memorandum in support of this Motion, plaintiffs hereby move for leave to file the attached Reply to Defendants' New Arguments in Support of Their Rule 12(b)(1) Motion to Dismiss the Amended Complaint.

Plaintiffs, by their Attorneys,



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David J. Strachman #4404  
McIntyre, Tate, Lynch & Holt  
321 South Main Street, Ste. 400  
Providence, RI 02903  
(401) 351-7700  
(401) 331-6095 (fax)

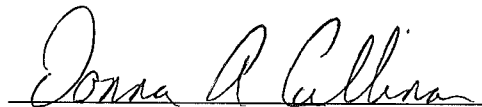
CERTIFICATION

I hereby certify that on the 14<sup>th</sup> day of November, 2003 I mailed a true copy of the within to:

Ramsey Clark  
Lawrence W. Schilling  
36 East 12<sup>th</sup> Street  
New York, NY 10003



Deming E. Sherman  
Annemarie M. Carney  
EDWARDS & ANGELL, LLP  
2800 Bank Boston Plaza  
Providence, RI 02903

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C.A. No. 00 - 105L

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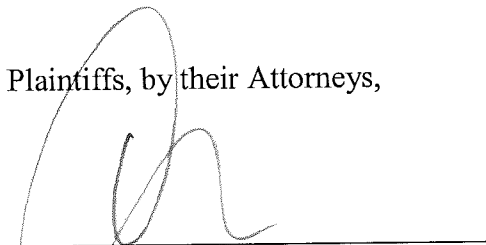
**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE  
TO FILE A REPLY TO DEFENDANTS' NEW ARGUMENTS  
IN SUPPORT OF THEIR RULE 12(b)(1) MOTION**

While plaintiffs are loathe to burden the Court with further pleadings, the PA and PLO have filed a "Response to Plaintiffs' Surreply in Further Support of Defendants' Rule 12(b)(1) Motion to Dismiss" containing two entirely new arguments that were not included in defendants' Motion to Dismiss or their Reply brief.

Plaintiffs should be given an opportunity to briefly address these two new arguments.

Therefore, the Court is respectfully requested to permit plaintiffs to file the attached Reply to Defendants' New Arguments in Support of Their Rule 12(b)(1) Motion to Dismiss the Amended Complaint

Plaintiffs, by their Attorneys,



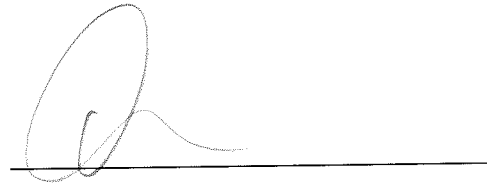
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A handwritten signature in dark ink, appearing to be "D. Sherman", is written over a horizontal line.

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